

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN DOE,

Case No. 15 cv 8652-LTS

Petitioner/Judgment Creditor,

vs.

EJERCITO DE LIBERACION NACIONAL,  
a/k/a ELN, a/k/a National Liberation Army,  
and FUERZAS ARMADAS  
REVOLUCIONARIOS DE COLOMBIA,  
a/k/a FARC, a/k/a REVOLUTIONARY  
ARMED FORCES OF COLOMBIA,

Defendants/Judgment Debtors,

and

JP MORGAN CHASE BANK, N.A.,

Respondent.

**NOTICE OF PARTIAL  
WITHDRAWAL WITHOUT  
PREJUDICE**

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JP MORGAN CHASE BANK, N.A.,

Third Party Petitioner,

vs.

KEITH S TANSELL, MARC GONSALVES,  
THOMAS HOWES, JUDITH G. JANIS,  
CHRISTOPHER T. JANIS, GREER C. JANIS,  
MICHAEL J. JANIS, JONATHAN N. JANIS,  
ANTONIO CABALLERO, KASSIM TAJEDDINE,  
METROPOLITAN LIFE INSURANCE COMPANY,  
GRAND STORES LTD., TRUST BANK LTD.,  
CREDIT SUISSE AG, TAJCO a/k/a TAJCO LTD.,  
ARAB GAMBIAN ISLAMIC BANK LTD.,  
and AHLI UNITED BANK UK PLC,

Third Party Respondents.

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Petitioner/Judgment Creditor John Doe, through undersigned counsel, hereby gives notice of partial withdrawal without prejudice of the Petition for Turnover Order Directed at JP Morgan Chase Bank, N.A. (the “Petition for Turnover”) as concerns two blocked accounts held by Respondent JP Morgan Chase Bank, N.A.

Petitioner John Doe hereby withdraws any claim to the funds held in 1) blocked account number ending 6923, containing the surrender value of two insurance policies – a life insurance policy and/or personal accident policy – purchased by Kassim Tajeddine from American Life Insurance Company, Lebanon Branch, a predecessor-in-interest or subsidiary of Third Party Respondent Metropolitan Life Insurance Company, before his designation as a Specially Designated Global Terrorist; and 2) blocked account ending in 3534 containing the final premium payments received by American Life Insurance Company, Lebanon Branch from Kassim Tajeddine for the two insurance policies.

Petitioner John Doe does not withdraw the Petition for Turnover as concerns any other accounts subject to the Petition for Turnover held by JP Morgan Chase Bank, N.A.

Dated this 7<sup>th</sup> day of December, 2015.

Respectfully submitted,

/s/ Brett E. von Borke  
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*Counsel for Plaintiff/Judgment Creditor*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 7, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Brett E. von Borke  
Brett E. von Borke, Esq.